

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
Attorney for Defendant  
By: JOSEPH A. PANTOJA  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Tel: (212) 637-2785  
Fax: (212) 637-2750  
E-mail: [joseph.pantoja@usdoj.gov](mailto:joseph.pantoja@usdoj.gov)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	x
RECLAIM THE RECORDS and ALEC	
FERRETTI,	:
	: 23 Civ. 1650 (JPC)
Plaintiffs,	:
	: NOTICE OF MOTION
-v-	:
UNITED STATES DEPARTMENT OF STATE,	:
	:
Defendant.	:
-----	x

PLEASE TAKE NOTICE that upon the complaint, defendant's memorandum of law, the Declaration of Regina L. Ballard dated February 1, 2024, and the exhibits thereto, and all other pleadings and proceedings in this action, defendant United States Department of State will move this Court before the Honorable John P. Cronan, United States District Judge, United States Courthouse, Courtroom 12D, 500 Pearl Street, New York, New York 10007, for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other relief as is just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the schedule entered by the Court, plaintiffs' opposition to defendant's motion shall be filed on or before March 14, 2024.

Dated: New York, New York  
February 1, 2024

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendant*

By: /s/ Joseph A. Pantoja  
JOSEPH A. PANTOJA  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, NY 10007  
Tel.: (212) 637-2785  
Fax: (212) 637-2750  
E-mail: [joseph.pantoja@usdoj.gov](mailto:joseph.pantoja@usdoj.gov)